

GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600, Las Vegas, Nevada 89135
Telephone: (702) 792-3773 | Facsimile: (702) 792-9002

KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
KYLE A. EWING, Bar No 014051
ewingk@gtlaw.com
CHRISTIAN T. SPAULDING, No. 014277
spauldingc@gtlaw.com
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

JARROD L. RICKARD, Bar No. 10203
jlr@skrlawyers.com
KATIE L. CANNATA, Bar No. 14848
klc@skrlawyers.com
SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803
Facsimile: (702) 920-8669

*Attorneys for Geoff Winkler Receiver for
J&J Consulting Services, Inc., J&J Consulting Services, Inc.,
J and J Purchasing LLC, The Judd Irrevocable Trust,
and BJ Holdings LLC*

DAVID R. ZARO*
dzaro@allenmatkins.com
JOSHUA A. del CASTILLO*
jdelcastillo@allenmatkins.com
MATTHEW D. PHAM*
mpham@allenmatkins.com
*admitted *pro hac vice*
**ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP**
865 South Figueroa Street
Suite 2800
Los Angeles, California 90017-2543
Telephone: (213) 622-5555
Facsimile: (213) 620-8816

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,
Plaintiff

vs.

MATTHEW WADE BEASLEY; et al.,
Defendants
THE JUDD IRREVOCABLE TRUST, et al.,
Relief Defendants

CASE NO. 2:22-cv-00612-CDS-EJY

**STIPULATION AND ORDER
AUTHORIZING RELEASE OF FUNDS
TO RECEIVER**

The following Stipulation and [Proposed] Order Authorizing Release of Funds to the Receiver (the “Stipulation”) is entered into by and between: 1) Geoff Winkler, the Court-appointed receiver in the above-entitled action (the “Receiver”); 2) Plaintiff Securities and Exchange

Commission (“SEC”); and 3) Defendant Christopher Madsen (“Madsen”) (collectively, the “Parties”), by and through their respective representatives, and with respect to the following facts:

1. At the outset of this case, the SEC moved, *ex parte*, for the Entry of a Temporary Restraining Order and Orders: (1) Freezing Assets; (2) Requiring Accountings; (3) Prohibiting the Destruction of Documents; (4) Granting Expedited Discovery; and (5) Order to Show Cause Re: Preliminary Injunction (the “TRO Application”) (ECF No. 2) and a TRO was thereafter issued (ECF No. 3).

2. The terms of the TRO were later affirmed via this Court’s entry of the Preliminary Injunction. (ECF No. 56).

3. The Receiver was appointed on June 3, 2022 pursuant to this Court’s Order Appointing Receiver (ECF No. 88) which was amended on July 28, 2022 (ECF 207) (collectively, the “Appointment Order”).

4. On June 29, 2022, the SEC filed its Amended Complaint in the above-entitled action (ECF No. 118).

5. On June 29, 2022, the SEC filed a motion to amend the Preliminary Injunction Order to extend the existing preliminary injunction and asset freeze to those Defendants added in the Amended Complaint, which Defendants included Chris Madsen (ECF No. 119). The motion was granted, and an Amended Preliminary Injunction Order issued by the Court on July 28, 2022 (ECF No. 206)(“Preliminary Injunction Order”).

6. As a result of the Preliminary Injunction Order, certain assets of Defendants were frozen including Madsen’s accounts held by Boulder Dam Credit Union.

7. On August 23, 2022, the Commission, the Receiver, and Madsen stipulated that “[t]he Boulder Dam Credit Union Account ending in 2001 (the “Boulder Dam Checking Account”) held in the name of Christopher Madsen could be unfrozen to allow Defendant Madsen to pay living expenses and hold going-forward, earned income unconnected to the conduct alleged in the Complaint” (ECF No. 271).

8. Through this Stipulation, the Parties, and each of them, hereby stipulate, agree, and consent to the release of all funds held in the Boulder Dam Credit Union associated with account

number ending in 7003 and account number 2001-01 (“the Accounts”), to allow such funds to be wired to an account established by the Receiver.

ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned that:

A. The funds held in the Accounts shall be released pursuant to the terms of this Stipulation;

B. All balances held in the Accounts as of this date, shall be wired to the account established by the Receiver ending in 0381 pursuant to instructions to be provided by the Receiver.

DATED this 19th day of October 2023

GREENBERG TRAURIG, LLP

/s/ Kara B. Hendricks

KARA B. HENDRICKS, ESQ.

Nevada Bar No. 07743

KYLE A. EWING, ESQ.

Nevada Bar No. 014051

CHRISTIAN T. SPAULDING

Nevada Bar No. 014277

*Attorneys for Geoff Winkler, Receiver for
J&J Consulting Services, Inc., J&J
Consulting Services, Inc., J and J
Purchasing LLC, The Judd Irrevocable
Trust, and BJ Holdings LLC*

DATED this 19th day of October 2023

**SECURITIES & EXCHANGE
COMMISSION**

/s/ Casey R. Fronk

CASEY R. FRONK, ESQ.

(Illinois Bar No. 6296535)

351 South West Temple, Suite 6.100

Salt Lake City, Utah 84101

Telephone: (810) 524-5796

Facsimile: (810) 524-3558

*Attorneys for Plaintiff,
Securities & Exchange Commission*

DATED this 19th day of October 2023

PRYOR CASHMAN, LLP

/s/ John Giardino

JOHN GIARDINO, ESQ.*

**Admitted Pro Hac Vice*

New York Bar No. 1838671

7 Times Square

New York, New York 10036-6569

jgiardino@pryorcashman.com

Telephone: (212) 326-0829

Facsimile: (212) 326-0806

Attorneys for Christopher Madsen

1 **IT IS HEREBY ORDERED** that:

2 A. The funds held in the Accounts shall be released pursuant to the terms of the
3 Stipulation;

4 B. All balances held in the Accounts as of this date, shall be wired to the account
5 established by the Receiver ending in 0381 pursuant to instructions to be provided by the Receiver.

6
7 
8 _____
HON. CRISTINA D. SILVA
Judge, United States District Court

9 Date: October 23, 2023
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28